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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON
(Portland Division)

ROBIN CURRIN, an individual, Plaintiff, v. **PRESIDIO NETWORKED SOLUTIONS GROUP, LLC,** a Delaware Limited Lability Corporation; **KRISTINA MAXWELL**; **KENNETH DAUGHERTY**; **GREG SEMLER**, individuals, Defendants.	Civil No. **COMPLAINT** (Gender Discrimination 42 U.S.C. § 2000e-2(a), ORS 659A.030; Retaliation 42 U.S.C. § 2000e-17, ORS 659A.030(1)(f); Aiding and Abetting ORS 659A.030(1)(g); Breach of Contract; Breach of the Covenant of Good Faith and Fair Dealing; Quantum Meruit) **DEMAND FOR JURY TRIAL**

NATURE OF THE ACTION

1. This is an action under 42 U.S.C. §2000e, et seq., Title VII of the Civil Rights Act of 1964, as amended by the Civil Rights Act of 1991, for violation of plaintiff's federal statutory rights, to correct unlawful employment practices, to vindicate plaintiff's rights and the

rights of other employees to work in environments free from unlawful harassment and discrimination based on sex, specifically gender and gender stereotyping and to make plaintiff whole. Plaintiff also seeks injunctive relief.

2. Defendants engaged in a pattern and practice of disparate treatment of female employees, and of creating and maintaining a hostile work environment amounting to employment discrimination, and retaliated against plaintiff for complaining and resisting such environment.

3. This is also an action for violation of Oregon state discrimination laws, ORS 659A.030, and common law claims pursuant to the court's supplemental jurisdiction.

JURISDICTION AND VENUE

4. This court has jurisdiction over the subject matter of this complaint pursuant to 28 U.S.C. § 1331.

5. This Complaint alleges unlawful employment practices committed in the District of Oregon, Portland Division.

6. It is also an action under Oregon state law to redress unlawful employment practices under ORS Chapter 659A, to vindicate plaintiff's right to work in an environment free from unlawful discrimination and retaliation, and for damages under common law claims.

7. The court has jurisdiction over plaintiffs' state law claims set forth in this complaint pursuant to its supplemental jurisdiction to hear related state law claims under 28 U.S.C. § 1367(a). Both the federal and state claims alleged herein arose from a common nucleus of operative fact, the state action is so related to the federal claim that they form part of

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the same case or controversy, and the actions would ordinarily be expected to be tried in one judicial proceeding.

PARTIES

8. Plaintiff **ROBIN CURRIN** is an individual resident of Oregon and at all material times was an 11-year employee of defendant Presidio Networked Solutions Group, LLC.

9. Defendant **PRESIDIO NETWORKED SOLUTIONS GROUP, LLC (Presidio)** was and is a foreign limited liability corporation, organized under the laws of the state of Delaware, and engaged in the practice of installing, integrating and distributing computer systems, and has continuously had and does now have more than 50 employees. At all material times relevant herein, defendant **PRESIDIO** was an employer within the meaning of 42 U.S.C. §2000e(b) and ORS 659A.001.

10. At all material times, **KRISTINA MAXWELL ("Maxwell")**, currently residing in the state of Texas; **KENNETH DAUGHERTY ("Daugherty")**, currently residing in the state of Oregon; **GREG SEMLER ("Semler")**, currently residing in the state of Washington were individual management and operational level employees and agents of defendant Presidio. Each aided and abetted the violation of Currin's statutory rights under ORS Chapter 659A as set forth herein and are individually liable to Currin therefor pursuant to ORS 659A.030(1)(g).

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PROCEDURAL REQUIREMENTS

11. Plaintiff has filed charges of unlawful employment practices with the Oregon Bureau of Labor & Industries, Civil Rights Division and Equal Opportunity Employment Commission.

12. Plaintiff has satisfied all administrative prerequisites to the filing of the statutory claims contained in this action.

FACTUAL ALLEGATIONS

13. Defendant Presidio employed Currin in various professional roles of increasing responsibility from September 2004 through her termination on June 17, 2015, as an Account Manager, Enterprise Account Manager, Regional Sales Manager and Director of Sales. Over the 11 years of Currin's employment with Presidio, Currin was a loyal, conscientious and highly profitable Account Manager, Director and employee.

14. Currin is an exceedingly qualified, experienced management level sales professional in the male-dominated industry of information and technology connectivity and integration services. As an Account Manager, Currin brought over $45 million in revenue to Presidio. Currin's account base included high value clients such as Nike, Columbia Sportswear, state agencies in Oregon, Washington and Idaho, Bechtel National at the Hanford Nuclear Power Plant, Bonneville Power, and other high net-worth enterprises and innovative companies. Currin was responsible for developing client contracts, project oversight, and supervising her motivated, highly productive sales team.

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15. Currin built up and managed a pipeline of work valued at over $150 million at the time of her termination. Throughout her tenure with Presidio, Currin received high achiever status and recognition in the exclusive "President's Club" in 2006, 2008 and 2010. She regularly ranked in the top 5 sales representatives as rated by revenue and profit generated. Currin was the first sales representative, male or female, to secure a customer project purchase order for over $1 million. Currin's team achieved 130% of their goal their first year, and regularly exceeded their goals going forward.

16. Currin's productivity and revenue generation consistently placed her on a par with Presidio's top performing male Account Managers, however, her compensation and employment "perks" lagged behind less productive and less experienced male peers who generated far less, sometimes zero, revenue for Presidio. On multiple occasions, Currin called out and opposed gender-based pay, opportunity and power inequities at Presidio, and asked defendant's upper level managers to address and remedy these issues.

17. For much of her tenure with Presidio, Currin was the only Management level woman on the Portland team under Defendant Daugherty's direct supervision. For the duration of her employment, Presidio was aware of and condoned the unequal gender treatment of Currin compared to her male colleagues in the following ways:

a. At the time of Currin's hire in September 2004 Supervisor Daugherty offered Currin a commission only compensation plan while the male account managers received a base salary plus commissions.

b. Throughout Currin's employment Supervisor Daugherty promoted partnership meetings between the male account managers and their manufacturing counterparts,

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while actively discouraging and prohibiting Currin from attending similar meetings with her manufacturing counterparts.

c. Throughout Currin's employment Supervisor Daugherty routinely held offsite "team building" events for the purpose of creating sales opportunities and client partnerships for the male account managers. The events included fishing trips, dinners, conferences, out-of-town training sessions, and other out-of-office functions. Daugherty excluded Currin and other women from these events. With respect to at least one of the fishing excursions, Daugherty told Currin she and another female employee could not go because it was "sort of a guy thing." When the men returned from these exclusive men only team building events, Currin learned that pornography was permitted at these "meetings."

d. When Currin expressed her concerns about the gender equality at Presidio, she found herself the target of discipline from the same Human Resources team to whom she made her gender discrimination complaints.

e. In December 2014 (after Currin complained about the unequal gender treatment), Supervisor Daugherty assigned a male colleague to Currin's accounts and forced Currin to split her sales and commissions with the male colleague. Daugherty did not assign additional account managers to male manager's accounts or force them to split their commissions or sales.

f. Supervisor Daugherty refused to assign Currin to an Alaskan account, in spite of the lead engineer (Mark Fletcher) requesting Currin. When asked why Daugherty stated, "Could you imagine Robin showing up in her 'bunny boots?'"

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g. In spite of Currin's years of experience, exceptional performance, and knowledge which far exceeded that of her male colleagues, Supervisor Daugherty offered Currin a salary of $45,000 less than her male colleagues in the Director of Sales position.

h. Throughout Currin's employment Supervisor Daugherty offered Currin's male colleagues bonuses and incentives in the form of stock options as a manner of increasing their compensation packages, but did not offer them to Currin.

i. In September 2014, Daugherty sponsored a dinner for a visiting corporate Vice President. During the dinner, the VP overheard Daugherty announce that Currin was very difficult to work with, and "You need to know what you are getting yourself into when you work with Robin." Daugherty never talked about any male Account Managers in this manner.

j. In late September 2014, a senior engineer approached Currin about working with him on the ConocoPhilips account and doing some consulting work. The assigned account representative had not worked the account, and was not responding to the engineer's inquiries. Currin tried to determine if the account was available, and offered to assist and share it with the assigned account representative. Daugherty accused Currin of trying to poach the account. Daugherty did not accuse male Account Managers of trying to poach accounts when they engaged in similar behavior. To the contrary, Daugherty encouraged and instructed a male account manager to steal one of Currin's largest accounts., Daugherty also frequently pulled high performing production staff and engineers from Currin's accounts and assigned them to male managers' accounts, interfering with her ability to service her accounts.

k. In October 2014 Supervisor Daugherty fined Currin $100 for arriving late to a training session during a company retreat. Although he also fined two male colleagues

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each $100 for arriving late, he then authorized a group of male colleagues to create an additional punishment for Currin. Daugherty did not request Currin or any others to determine additional punishment for the two male colleagues who were late.

l. From May 2014 to December 2014, Supervisor Goran Ognjenovic, and Greg Semler, Currin's dotted line executive sponsor, excluded Currin from meetings with representatives from Currin's main client Nike, insisting instead that Currin's male colleague John Pierce, Project Manager serve as lead on the account.

m. Currin was in the top 20 highest producing account managers (with all other top account managers being male) in the Pacific Northwest While all of top ranking account managers were known to be assertive and direct in their communication styles, only Currin was singled out as having a communication style that was gender stereotyped as too assertive and direct.

n. After Currin went to Human Resources with her concerns about the gender discrimination, Human Resource Representative Maxwell, Top Executive Semler, and direct supervisor Goran Ognjenovic began to discipline Currin for allegedly being too aggressive in her communication style. Maxwell told Currin to "soften" her style more like a "woman", but would not provide examples of Currin's style that were allegedly perceived as too aggressive or different from her male counterparts. Maxwell had her own bias about how women were to behave at the work place and was known to have her "favorites" who were mostly men. Currin's male colleagues routinely used gruff, aggressive, even profanity laced communication, and were never disciplined or told to "soften" their style. In fact, among the

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top male performers, gruff, aggressive, insensitive communication was perceived as successful and was rewarded by Presidio.

o. In January 2015, while discussing strategy Currin was developing with her largest account, Ognjenovic told Currin that she was not "winning the hearts and minds of people." Ognjenovic did not explain the comment. At a follow-up meeting, in response to Currin's expressed concerns about gender inequality within Presidio, Ognjenovic told Currin, "You are only treated about 30% differently than anyone else on the team."

p. Presidio failed to provide Currin the same considerations and opportunity to correct alleged performance deficiencies such as a written warning, or performance improvement plan which were customarily offered to male employees. Also, Currin was the only account manager, being female, who was called out for her communication style which was exactly like the communication style as her male counterparts.

18. Presidio, through defendant Daugherty, fostered a male dominated environment. Presidio encouraged the men to demonstrate strength, aggressiveness and ambition, but disciplined Currin for exhibiting similar traits. While the men were given public accolades for their achievements within the company, Currin was not given equal accolades for her successes.

19. Currin escalated her concerns through the chain of command to executive management on at least three occasions and asked for intervention and relief from the exclusion, harassment and discrimination. When no noticeable difference was detected in Daugherty's treatment of Currin, Currin first spoke privately with the HR representative and then formally complained to Presidio Human Resources personnel in June 2013. Investigation of Currin's

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complaint was minimal. Daugherty's behavior did not change. Currin tried again several times to address the ongoing gender discrimination and retaliation with new executive Semler between January 2015 and April, 2015. Instead of taking prompt, effective corrective action to stop the discriminatory conduct, defendants attacked Currin's communication style and performance and terminated her employment.

20. Currin also voiced support for her female colleagues, including but not limited to, proposing that Daugherty pay a female project manager the same compensation package as her male predecessor.

21. Despite assurances from defendant Semler that Currin would not be forced to report to Daugherty, after Ogjenovic's termination in April 2015 Currin was reassigned to Daugherty. When Currin complained to Semler and Maxwell about the reassignment and the continuing gender discrimination at Presidio, Presidio management orchestrated Currin's termination. Presidio's executives withheld commission payments due and owing to Currin, and also told the Accounts Receivable department not to tell Currin when key receivables came in for the purpose of depriving Currin of additional commissions she earned, all in retaliation for standing up for her legal rights.

22. As before, when Currin once again came under Daugherty's supervision, Daugherty held weekly one-on-one meetings with Currin's male colleagues but held no meetings with Currin. Daugherty also instructed new account manager Andrew Edgar to drive his own communications inside Currin's largest accounts, and to hold meetings with the manufacturer representatives without Currin's knowledge or involvement.

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23. On June 12, 2015, Human Resources Maxwell and Defendant Semler summoned Currin to a meeting. At that meeting, Maxwell claimed she received nine complaints from 9 employees against Currin. Maxwell refused to provide Currin with any examples, situations, statements, or scenarios to illustrate the basis for any of the complaints. Further, Maxwell, for the first time alleged that Presidio had been trying to deal with Currin's "pervasive and demonstrative" communication style for the past six to nine months. Currin was never put on any type of communication performance plan by Human Resources and was never given the opportunity to find out specifically what the nature of the complaints were about.

24. On June 17, 2015, Currin again met with Semler and Maxwell to follow up on the June 12, 2015 meeting. At that meeting Semler terminated Currin's employment. Currin never received written warning and was never placed on a performance improvement plan in accordance with Presidio's own written policies and consistent conduct for other employees.

25. At the time of Currin's termination, Presidio owed Currin over $72,000 in commissions for prior work. At the time of her termination, Currin expected over $203,000 in commissions from work that was completed, but not yet paid for by the client. Presidio intentionally withheld these commissions and terminated Currin under the pretext of complaints against her to intentionally avoid paying her hard-earned commissions. Prior to Currin being terminated, Presidio intentionally withheld account receivable collection information from Currin so she would not know what commissions she had lawfully earned.

26. After Currin was terminated, she requested her personnel file from Presidio. She received a written copy of her personnel file. Nothing in Currin's personnel file contained any written warning, any performance improvement plan, any documented complaints against her or

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any other indication that Currin was anything but an exemplary high revenue producing account manager for Presidio.

27. Presidio's disparate treatment of Currin is not limited to the foregoing allegations.

FIRST CLAIM FOR RELIEF AGAINST DEFENDANT PRESIDIO

(Violations of 42 U.S.C. §2000e-2(a) – Sex Discrimination)

28. Plaintiff incorporates by reference the allegations of paragraphs 1 through 27.

29. Presidio acted against Currin as alleged herein under circumstances in which it did not and would not have acted similarly as against comparable male employees.

30. Presidio's actions as alleged herein are discriminatory in the terms and conditions of Currin's employment based on sex/gender.

31. Presidio's actions resulting in the discharge of Currin's employment are discriminatory based on sex/gender. Presidio's discriminatory actions as alleged herein were in violation of 42 U.S.C. § 2000e-2(a).

32. Currin is entitled to an order declaring defendants in violation of the statutory rights of plaintiff as set forth in this complaint and to such injunctive relief as the court finds appropriate to cause defendants to stop their violations of law and disregard of the statutory rights of employees.

33. As a result of the unlawful actions alleged herein, Currin suffered and continues to suffer severe emotional injury and loss of enjoyment of life. She is entitled to noneconomic damages sufficient to compensate her for her noneconomic injuries in such amount as may be found appropriate by a jury based on the evidence presented at trial.

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34. As a result of the unlawful actions alleged herein, Currin also suffered economic damages. She is entitled to recover her past and future lost wages and other compensation, past and future lost earning capacity, and other economic damages incurred in connection with the injuries caused by the actions alleged herein in such amount as may be awarded by a jury based on the evidence presented at trial.

35. The conduct alleged herein was an intentional violation of, or in reckless disregard for, plaintiff's federally protected rights. Such conduct exceeds the bounds of social toleration and is of a sort that would be deterred by an assessment against defendants of punitive damages in such amount as may be assessed by a jury based on the evidence presented at trial to punish defendants and deter it and others from similar action in the future.

36. Plaintiff is entitled to recover her reasonable attorneys' fees and costs incurred herein, pursuant to 42 U.S.C. § 1988.

SECOND CLAIM FOR RELIEF AGAINST DEFENDANT PRESIDIO

(Violations of 42 U.S.C. §2000e-17 - Retaliation)

37. Plaintiff incorporates by reference the allegations of paragraphs 1 through 27 and 32 through 36.

38. Presidio was substantially motivated to and did terminate Currin's employment due to her complaints of gender discrimination.

39. Presidio's actions as alleged herein were in retaliation against Currin in violation of 42 U.S.C. §2000e-17.

THIRD CLAIM FOR RELIEF AGAINST ALL DEFENDANTS

(Violations of ORS 659A.030 - Sex Discrimination)

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40. Plaintiff incorporates by reference the allegations of paragraphs 1 through 27, and 32 through 35.

41. Presidio's discriminatory actions as alleged herein were in violation of ORS 659A.030.

42. Defendants Semler, Maxwell, and Daugherty aided and abetted defendant Presidio in discriminating against Currin, in violation of ORS 659A.030(1)(g).

43. Defendant's acts as described herein were an intentional disregard of the rights of plaintiff, in reckless disregard of defendant's societal obligations, and committed with conscious indifference to the health, safety and welfare of plaintiff. Defendant should be assessed punitive damages in such amount as may be found appropriate by a jury based on evidence presented at trial to punish defendant and to deter defendant and others from similar conduct in the future.

44. Plaintiff is entitled to recover her reasonable attorney fees and costs, and expert witness fees and costs, pursuant to ORS 659A.885 and ORS 20.107.

FOURTH CLAIM FOR RELIEF AGAINST ALL DEFENDANTS

(Violations of ORS 659A.030 - Retaliation)

45. Plaintiff incorporates by reference the allegations of paragraphs 1 through 27, 32 through 35 and 41 through 44.

46. Presidio's actions as alleged herein were in retaliation against Currin in violation of ORS 659A.030(1) (f).

FIFTH CLAIM FOR RELIEF AGAINST DEFENDANT PRESIDIO

(Breach of Contract)

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47. Plaintiff incorporates by reference the allegations of paragraphs 1 through 27.

48. Presidio breached the terms of the Compensation Agreement entered into between the parties by depriving Currin of the personnel, backup, support, training, client development opportunities and other requisites of the position as necessary to perform her duties and as required under the parties' agreement.

49. Currin demanded that Presidio cure its failure to provide her with the personnel, backup, support, training, client development opportunities and other requisites of the position as necessary to perform her duties, but Presidio failed and refused to do so in breach of the parties' compensation agreement.

50. Presidio terminated Currin's employment without good faith reason and without paying Currin all monies due and owing to her.

51. Currin invested substantial hours and effort toward cultivating favorable relationships with clients while she served as an employee of Presidio. As a result, those clients often sought Presidio for their repeat systems needs and provided Presidio employees other than plaintiff with substantial work from which Presidio benefitted.

52. Currin conferred upon Presidio the valuable benefit of her services at the Company's request and with the Company's knowledge and acquiescence.

53. Currin had a reasonable expectation of continuing to receive payment for her services in the form of commissions, bonus, and other consideration resulting from her past and continuing relationship with company's clients.

54. Presidio reasonably should have expected to compensate Currin for her services in establishing and maintaining her valuable relationships with clients.

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55. Currin is entitled to recover the reasonable value of the work she performed and client contracts in process at the time of her termination.

SIXTH CLAIM FOR RELIEF AGAINST DEFENDANT PRESIDIO

(Breach of Covenant of Good Faith and Fair Dealing)

56. Plaintiff incorporates by reference the allegations of paragraphs 1 through 27, and 48 through 55.

57. Presidio and its managers and agents owed a duty of good faith and fair dealing in its performance of its contract with Currin.

58. Presidio breached its duty of good faith and fair dealing when it terminated Currin in bad faith and for discriminatory and/or retaliatory reasons.

59. Presidio breached its duty of good faith and fair dealing when it withheld payment of commissions due and owing to Currin at the time of her termination.

60. Presidio breached its duty of good faith and fair dealing when it terminated Currin's employment in order to avoid paying out commissions for work Currin performed but for which the client had not yet paid.

In the alternative to Plaintiff's Fifth Claim for Relief, plaintiff alleges:

SEVENTH CLAIM FOR RELIEF AGAINST DEFENDANT PRESIDIO

(Quantum Meruit)

61. Plaintiff incorporates by reference the allegations of paragraphs 1 through 27 and 50 through 55.

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62. By terminating Currin, Presidio has been unjustly enriched by the retention of the value of Currin's services by failing to compensate her for the contract commissions resulting from Currin's investment in her relationship with clients she served.

63. It would be unjust to allow Presidio to retain the value of plaintiff's services without requiring the company to pay Currin compensation representing the value of her work.

64. Currin is entitled to recover from Presidio an amount to be established at trial representing the amount by which Presidio has been and will be unjustly enriched due to its actual or constructive termination of Currin's employment.

65. In the alternative to the preceding paragraph, Currin is entitled to an accounting to determine the amount by which Presidio has been unjustly enriched due to its termination of Currin's employment.

PRAYER FOR RELIEF

WHEREFORE, plaintiff requests the Court to:

1. Declare defendants in violation of the statutes set forth in plaintiff's claims for relief;

2. Award plaintiff compensation for her lost past wages and benefits of employment and lost earning capacity and future earnings and benefits;

3. Order an accounting to determine the appropriate amount of economic damages to assess against defendant on plaintiff's unjust enrichment claim;

4. Order defendants to make plaintiff whole by providing compensation for noneconomic losses in amounts as are awarded by the court or a jury;

5. Assess punitive damages against defendants in such amount as found appropriate

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by a jury;

6. Award plaintiff her costs of suit and reasonable attorney fees, costs, and expert witness fees;

7. Order defendants to pay prejudgment interest and post-judgment interest on all amounts due to plaintiff as a result of this action, with interest at the prevailing rate; and

8. Order such further or alternative relief in favor of plaintiff as the court deems appropriate.

JURY TRIAL DEMAND

Plaintiff demands a jury trial on all questions of fact or combined questions of law and fact raised by this complaint.

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